

Application of Pacific Gas and Electric Company  
To Increase Gas and Electric Revenue  
Requirements, Rates and Charges for a Pension  
Contribution, Effective January 1, 2006.

Application 05-12-021

**JOINT MOTION FOR EXTENSION OF SCHEDULE  
OF THE DIVISION OF RATEPAYER ADVOCATES  
AND PACIFIC GAS AND ELECTRIC COMPANY**

**I. INTRODUCTION AND SUMMARY OF  
RECOMMENDATIONS**

Pursuant to Rule 45 of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) and Pacific Gas and Electric Company (PG&E) file this Motion jointly to request an extension in the schedule for the above-captioned proceeding. Pursuant to Rule 2.2(d), counsel for PG&E has authorized DRA to file this Motion on behalf of PG&E as well as DRA.

The relief requested would extend the schedule for all due dates by about two weeks, but retain the Mandatory Settlement Conference deadline of February 24, 2006. Given the time constraints, DRA and PG&E are also jointly filing a Motion for An Order Shortening Time for Responses.

**II. DISCUSSION**

On February 1, 2006, the Assigned Commissioner's Ruling and Scoping Memo (ACR) was issued in this case. The ACR set a schedule in which "written testimony, if any, from the Division of Ratepayer Advocates and Intervenor" would be due February 17, 2006 and a Mandatory Settlement Conference would be held by February 24, 2006. Other dates for other events were set as well.

The ACR also provided that “the Assigned Commissioner and the assigned Administrative Law Judges (ALJs) may modify the schedule, as needed.” (ACR, p. 3.) The goal stated in the ACR “is to conclude this proceeding as soon as practical, and no later than 18 months from the date of this Ruling and Scoping Memo as contemplated by Pub. Util. Code 1701.5.” (ACR, p. 3.)

DRA and PG&E jointly request that the schedule be modified to extend the schedule for all due dates by about two weeks. DRA and PG&E do not, however, propose a change in the deadline of February 24, 2006 for the Mandatory Settlement Conference, because the two week extension will provide additional time for parties to prepare for the settlement conference. As modified, the schedule would still conclude this case within the 18-month period.

The ACR calls for the Proposed Decision on June 20 and the Final Decision on July 20. Because the next Commission Meeting after July 20 is scheduled for August 24, DRA and PG&E offer two sets of alternative dates for the end of the schedule, as follows: 1) June 20 (67 days after submission) for the Proposed Decision and July 20 (30 days later) for the Final Decision; or July 13 (90 days after submission) for the Proposed Decision and August 24 (42 days later) for the Final Decision.

DRA also seeks this extension to allow DRA staff sufficient time to receive and review outstanding responses to data requests and to use the data for both its settlement negotiations and, if necessary, its litigation in this matter. DRA and PG&E are hopeful that the brief extension they propose will facilitate the goals set forth in the ACR of settling all issues, or reaching a joint stipulation on material facts.

DRA and PG&E therefore propose the following schedule:

Written Testimony, if any, from DRA and Intervenors	March 3, 2006
Mandatory Settlement Conference	by February 24, 2006
Rebuttal Testimony	March 17, 2006
Joint Case Management Statement	March 20, 2006
Evidentiary Hearings	March 29 and 30, 2006

Concurrent Opening Briefs	April 7, 2006
Requests for Oral Argument	April 7, 2006
Concurrent Reply Briefs	April 14, 2006
Projected Submission Date	April 14, 2006
Proposed Decision	June 20 or July 13, 2006
Final Decision	July 20 or August 24, 2006

Respectfully submitted,

/s/ LAURA J. TUDISCO

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February 9, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of **JOINT MOTION FOR EXTENSION OF SCHEDULE OF THE DIVISION OF RATEPAYER ADVOCATES AND PACIFIC GAS AND ELECTRIC COMPANY** in **A.05-12-021** by using the following service:

☒ **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

☐ **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on February 9, 2006, at San Francisco, California.

/s/ MARTHA PEREZ

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Martha Perez

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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